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March 11, 2012

BY ECF

Honorable Sandra L. Townes
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Michael Dolphin, et al., 11 Cr. 005

Dear Judge Townes:

As requested, I write to inform the Court that Mr. Dolphin joins in his co-defendant Mr. Wehnert's motion to dismiss the indictment based on irregularities in the special grand jury. He also joins in Mr. Vernace's motions Points Six through Ten requesting that the government be compelled to (1) provide a witness list; (2) preserve all law enforcement notes of witness interviews; (3) notify the defendants of what it seeks to introduce as enterprise evidence and/or pursuant to Federal Rules of Evidence 404(b); (4) provide a list of recordings and other exhibits it intends to offer at trial; and (5) produce the witnesses requested and permit them to be interviewed by the defense.

Respectfully submitted,
/s/
Sarita Kedia

cc: Government counsel
 All defense counsel
 (By ECF)